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Attorneys for Defendant Brown

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

METHVEN & ASSOCIATES, A
PROFESSIONAL CORPORATION,

Plaintiff,

v.

SCARLETT PARADIES-STROUD,
et al.,

Defendants.

CIVIL NO. 13-1079 JSW

ANSWER OF STEVEN AMES
BROWN TO COMPLAINT;
DEMAND FOR TRIAL BY JURY

1 Defendant Steven Ames Brown ("Defendant") responds to Plaintiff's *Complaint*
2 (*Document 1*), as follows:

3 1. Defendant lacks sufficient knowledge or information to form a belief as to the
4 truth of the allegations in the first sentence of paragraph 1, and on that basis denies each
5 and every allegation contained therein. Defendant admits the allegations of the second
6 sentence of paragraph 1.

7 2. Defendant admits the allegations of the first sentence of paragraph 2.
8 Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations in the second sentence of paragraph 2, and on that basis denies each and
10 every allegation contained therein.

11 3. Defendant lacks sufficient knowledge or information to form a belief as to the
12 truth of the allegations of paragraph 3, and on that basis denies each and every allegation
13 contained therein.

14 4. Defendant admits the allegations of paragraph 4.

15 5. Defendant lacks sufficient knowledge or information to form a belief as to the
16 truth of the allegations of paragraph 5, and on that basis denies each and every allegation
17 contained therein.

18 6. Defendant lacks sufficient knowledge or information to form a belief as to the
19 truth of the allegations of paragraph 6, and on that basis denies each and every allegation
20 contained therein.

21 7. Defendant admits the allegations of paragraph 7.

22 8. Defendant lacks sufficient knowledge or information to form a belief as to the
23 truth of the allegations of paragraph 8, and on that basis denies each and every allegation
24 contained therein.

25 9. Defendant lacks sufficient knowledge or information to form a belief as to the
26 truth of the allegations of paragraph 9, and on that basis denies each and every allegation

1 contained therein.

2 10. Defendant lacks sufficient knowledge or information to form a belief as to the
3 truth of the allegations of paragraph 10, and on that basis denies each and every
4 allegation contained therein.

5 11. Defendant lacks sufficient knowledge or information to form a belief as to the
6 truth of the allegations of paragraph 11, and on that basis denies each and every
7 allegation contained therein.

8 12. The first sentence of paragraph 12 merely states Plaintiff's opinions or legal
9 conclusions, and therefore no response is required. Defendant admits the allegations of
10 the second and third sentences of paragraph 12.

11 13. Defendant admits the allegations of paragraph 13, except to the extent the
12 allegations suggest that the inventory contains the entirety of the Nina Simone audio and
13 audiovisual recordings of Nina Simone in Plaintiff's possession, custody or control.

14 14. Defendant admits the allegations of paragraph 14.

15 15. Defendant admits the allegations of paragraph 15, except to the extent it
16 suggests that Mr. Stroud had any gifts from Nina Simone in his possession.

17 16. Defendant lacks sufficient knowledge or information to form a belief as to the
18 truth of the allegations of paragraph 16, and on that basis denies each and every
19 allegation contained therein.

20 17. Defendant lacks sufficient knowledge or information to form a belief as to the
21 truth of the allegations of paragraph 17, and on that basis denies each and every
22 allegation contained therein.

23 18. Defendant admits that there are such claims in some of the actions identified in
24 paragraph 18 but lacks sufficient knowledge or information to form a belief as whether all
25 identified actions contain such claims, and on that basis denies each and every other
26 allegation contained therein.

1 19. Defendant lacks sufficient knowledge or information to form a belief as to the
2 truth of the allegations of paragraph 19, and on that basis denies each and every
3 allegation contained therein.

4 20. Defendant lacks sufficient knowledge or information to form a belief as to the
5 truth of the allegations of paragraph 20, and on that basis denies each and every
6 allegation contained therein.

7 21. Defendant admits the allegations of paragraph 21.

8 22. Defendant admits the allegations of paragraph 22.

9 23. Defendant admits the allegations of paragraph 23.

10 24. Defendant admits the allegations of paragraph 24.

11 FIRST AFFIRMATIVE DEFENSE

12 Plaintiff's claims fail to allege sufficient facts to state a claim upon which relief may
13 be granted.

14 SECOND AFFIRMATIVE DEFENSE

15 Plaintiff's claims are barred by the doctrine of unclean hands.

16 THIRD AFFIRMATIVE DEFENSE

17 Plaintiff's claims are barred by the applicable period of limitations.

18 FOURTH AFFIRMATIVE DEFENSE

19 Plaintiff's claims are barred by the doctrine of laches.

20 FIFTH AFFIRMATIVE DEFENSE

21 Plaintiff's claims are barred by the doctrine of waiver.

22 SIXTH AFFIRMATIVE DEFENSE

23 Plaintiff's claims are barred by the doctrine of estoppel.

24 WHEREFORE, Defendant prays judgment as follows:

- 25 1. That Plaintiff account for all recorded audio and audiovisual performances of
26 Nina Simone in its possession, custody or control;

2. That Defendant and the Estate of Nina Simone be confirmed as the owners of all property subjected to these proceedings;
3. For costs of suit.
4. For such other relief as the Court may deem just.
5. Defendant demands a trial by jury.

Dated: May 10, 2013

Respectfully submitted,

/x/

STEVEN AMES BROWN,
Defendant in *pro se*